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Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

Ex Parte Submission

RE: AT&T Petition for Waiver of Lower 700 MHz Band Interim and End-of-Term Geographic Construction Benchmarks for Alaska B-Block License WQIZ358, WT Docket No. 16-335

Dear Ms. Dortch:

On December 2, 2016, AT&T filed an *ex parte* letter in this docket proposing alternative population-based benchmarks for Lower 700 MHz B block call sign WQIZ358, in the Alaska 1-Wade Hampton, Alaska, Cellular Market Area ("CMA315"). Specifically, AT&T proposed population benchmarks of 70% interim and 80% end-of-term plus 5 years and a commitment to negotiate in good faith with any third party seeking to lease spectrum in unserved areas during any license renewal term. These commitments were made in anticipation that AT&T's build showing would otherwise comply with Federal Communications Commission ("FCC") rule section 27.14(g), including the exclusion of uncovered government lands.

If government lands are not excluded, AT&T still serves over 70% of the population of CMA315 as of the interim benchmark date and renews its commitment to that level of population-based service. However, AT&T would be unable to meet an 80% population-based benchmark by the end of the license term, June 13, 2019, due to difficulty getting backhaul to the northern-most areas of Alaska. Nevertheless, AT&T expects backhaul capacity to improve over time in CMA315 and, thus, as a supplement to its December 2, 2016 letter, AT&T will include government lands in its population-based coverage formula and offers to meet the following benchmarks after the interim benchmark date:

- By the end of the license term, June 13, 2019, AT&T will provide coverage and offer service over no less than 75% of the population of CMA315.
- By June 13, 2020, AT&T will provide coverage and offer service over no less than 80% of the population of CMA315.

- Until at least June 13, 2025, AT&T will maintain coverage and service over at least 80% of the population of CMA315.

For each of these benchmarks, AT&T will file a construction notification with the FCC as provided in rule section 27.14(k). Failure to meet these population-based benchmarks will result in loss of authorization to serve the geographic areas within CMA315 where AT&T expanded service after the end-of-term for WQIZ358 if the waiver is not granted (i.e. June 13, 2017).

In accordance with section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please feel free to contact me if you have any questions.

Sincerely,

cc: Suzanne Tetreault
Roger Noel
Richard Arsenault
Linda Chang
Amanda Huetinck
Anna Gentry